

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KARL BRANDON DAUPHIN,

CASE NO. 1:25-cv-00874-UNA

Plaintiff,

vs.

TRANSUNION, LLC

Defendant.

TRANS UNION LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union LLC (“Trans Union”) hereby removes the subject action from the Justice of the Peace Court No. 13 New Castle County, State of Delaware, to the United States District Court, District Of Delaware, on the following grounds:

1. Plaintiff Karl Brandon Dauphin served Trans Union on or about June 30, 2025, with Summons to Trans Union (“Summons”), and a Complaint (“Complaint”), filed in the Justice of the Peace Court No. 13, New Castle County, State of Delaware. Copies of Plaintiff’s Summons and Complaint are attached hereto as **Exhibit A**, and **Exhibit B**, and respectively. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See generally Complaint.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Justice of the Peace Court No. 13, New Castle County, State of Delaware, to the United States District Court, District Of Delaware.

5. Notice of this removal will promptly be filed with the Justice of the Peace Court No. 13, New Castle County, State of Delaware, and served upon all adverse parties.

WHEREFORE, Defendant Trans Union LLC, by counsel, removes the subject action from the Justice of the Peace Court No. 13, New Castle County, State of Delaware, to this United States District Court, District Of Delaware.

Date: July 15, 2025

Respectfully submitted,

/s/ Blake A. Bennett
Blake A. Bennett (#5133)
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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **15th day of July, 2025**, properly addressed as follows:

| | |
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| <u>Pro Se Plaintiff</u> Karl Brandon Dauphin 3128 Pheasant Dr. Decatur, GA 30034 | |
|--|--|

/s/ Blake A. Bennett
Blake A. Bennett (#5133)